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09/18/2009 03:28 PM

To "BAYUK Dana" <BAYUK.Dana@deq.state.or.us>, "McCue, Tom" <Tom.McCue@siltronic.com>

cc <agladstone@davisrothwell.com>, "Erik Bakkom" <ebakkom@maulfoster.com>, Eric Blischke/R10/USEPA/US@EPA, Chip

bcc

Subject RE: Siltronic, EIB Performance/Effectiveness Plan Comments

Dana – attached please find a memorandum summarizing the results of revised REMChlor modeling runs using the adjusted parameters from DEQ's comments of August 12, 2009.

MFA recommends (a) incorporating a source removal term (not previously used in the initial model run) and (b) revising calibration targets based upon early performance monitoring data (as opposed to pilot study data) along with the adjusted parameters suggested by DEQ.

We look forward to your feedback regarding this submittal.

jp

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From: BAYUK Dana [mailto:BAYUK.Dana@deq.state.or.us]

Sent: Wednesday, August 12, 2009 4:16 PM

To: McCue, Tom

Cc: agladstone@davisrothwell.com; James Peale; Erik Bakkom; rjw@nwnatural.com; Patty Dost (Schwabe); John Edwards; Carl Stivers; robe@hahnenv.com; blischke.eric@epa.gov; humphrey.chip@epa.gov; koch.kristine@epa.gov; sheldrake.sean@epa.gov; ANDERSON Jim M; GAINER Tom; LARSEN Henning; MCCLINCY Matt

Subject: Siltronic, EIB Performance/Effectiveness Plan Comments

Good afternoon Tom.

DEQ reviewed the "EIB Performance/Effectiveness Plan, Siltronic Corporation," dated June 30, 2009 (EIB P/E Plan). Our comments letter is attached.

<<Lfnl-EIB_PE_Plan.pdf>>

A signed hard copy of the attachment will be sent to you via regular mail this week.

Based on our review of the EIB P/E Plan, DEQ determined the document does not provide

adequate information to support contingency planning for the EIB Performance Monitoring Plan (PMP) being prepared. As such, DEQ's letter provides objectives for performance monitoring and criteria for implementing contingencies that should be incorporated into the EIB PMP.

In addition, DEQ concludes the current working version of the model being used to assess EIB likely underestimates the persistence of cVOCs in the source area and in the plume downgradient, and the time needed to remediate the source/plume. DEQ will expect Siltronic to develop alternate versions of the model with the objective of assessing source longevity and downgradient cVOC concentrations under reasonably conservative site specific assumptions. Model input parameters for alternative versions of the model are discussed in the attachment.

Siltronic should incorporate DEQ's comments into the EIB PMP as indicated, and submit the document for review within 14 days of receiving the signed hard copy of the attached letter. Within 30 days of receipt of the letter, lists of input parameters for alternative REMChlor simulations should be provided for DEQ's review.

DEQ appreciates and acknowledges Siltronic's ongoing efforts to monitor and evaluate the performance of EIB being used at the site. Please feel free to contact me with questions regarding this e-mail.

Mr. Dana Bayuk, Project Manager

Cleanup & Portland Harbor Section

Oregon Department of Environmental Quality

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Please visit our website at <http://www.oregon.gov/DEQ/> Mf-Revised REMChlor.pdf